

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

ELITE HOME CARE, LLC

v.

ELITE ANGELS
HOMECARE LLC

Case No. 3:24-cv-04554-JDA

**CONSENT MOTION TO EXTEND TIME FOR DEFENDANT
TO FILE ITS RESPONSIVE PLEADING**

Plaintiff Elite Home Care, LLC (“Plaintiff”) and Defendant Elite Angels Homecare LLC (“Defendant”) respectfully submit this Joint Motion to Extend Time for Defendant to File its Responsive Pleading. In further support of this Motion, the parties state as follows:

Good cause exists because the parties are actively discussing settlement of the matter. Possible final settlement would require activities that will take time to resolve, even with party diligence. Moreover, the timeline on some of the activities is outside of the parties’ immediate control.

There has been notable progress on some of these activities in recent months, and the parties currently wish to continue these actions without requiring court intervention.

Accordingly, the parties respectfully request that the Court allow Defendant to file its responsive pleading on or before January 31, 2025. A Proposed Order reflecting the foregoing is attached.

* * *

Respectfully Submitted,

/s/ Eric Menhart

Eric Menhart, Esq. *

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* Pending Admission *Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, a copy of the foregoing was served via the Court's electronic filing system

/s/ Rachel G. McConoughey

Rachel G. McConoughey, Esq.